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*Attorney for Defendants
Travel & Leisure Co.
Wyndham Worldwide Operations Inc. and
Wyndham Vacation Ownership*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KLALEH J. PARKER, an individual,

Plaintiff,

vs.

TRAVEL & LEISURE CO.; WYNDHAM
WORLDWIDE OPERATIONS INC.;
WYNDHAM VACATION OWNERSHIP;
AND DOES 1-10 and ROE ENTITIES 1-10,
inclusive,

Defendants.

Case No. 2:25-cv-00354-MDC

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT**

(SECOND REQUEST)

IT IS HEREBY STIPULATED by and between Plaintiff Klaleh J. Parker ("Plaintiff"), by and through her counsel, F. Travis Buchanan, Esq., & Assoc., PLLC, and Defendants, Travel & Leisure Co., Wyndham Worldwide Operations Inc. and Wyndham Vacation Ownership ("Defendants"), by and through their counsel, the law firm of Jackson Lewis P.C., that Defendants shall have an additional two-week extension up to and including **July 17, 2025**, in which to file their response to Plaintiff's Complaint. This Stipulation is submitted and based upon the following:

1. The current deadline to respond to the Complaint is July 3, 2025. (ECF No. 25).
2. Defendants are still in the process of investigating Plaintiff's allegations which include significant monetary damages, including, punitive damages.

1 3. The Parties have agreed to an additional two-week extension of the deadline for
2 Defendants to file their response to Plaintiff's Complaint to July 17, 2025, to allow Defendants
3 sufficient time to address the allegations within the Complaint.

4 4. This is the second stipulation to extend the time for Defendants to respond to
5 Plaintiff's Complaint.

6 5. The Parties believe these circumstances constitute good cause for granting an
7 extension. *See* Fed. R. Civ. P. 6(b)(1).

8 6. This Stipulation is made in good faith and not for the purpose of delay.

9 7. Nothing in this Stipulation and Order shall operate to waive, relinquish, or impair
10 any claim, defense, objection, or right of any party in this case. Further, nothing in this Stipulation
11 and Order shall be construed as an admission of or consent to the merit or validity of any claim,
12 defense, objection, or right by any party in this case.

13 Dated this 3rd day of July, 2025.

14 F. TRAVIS BUCHANAN, ESQ., &
15 ASSOC., PLLC

JACKSON LEWIS P.C.

16 /s/ F. Travis Buchanan
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Attorney for Defendants
Travel & Leisure Co.
Wyndham Worldwide Operations Inc. and
Wyndham Vacation Ownership

21 *Attorneys for Plaintiff*
22 *Klaleh J. Parker*

23 **ORDER**

24 IT IS SO ORDERED.

25
26 
United States District/Magistrate Judge

27 Dated: 7-3-25
28